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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SONORO INVEST S.A., a Panamanian
corporation,

Plaintiff,

vs.

ROBERT MILLER, an individual; ANDREW
SHERMAN, an individual; COSTAS
TAKKAS, an individual; and STEPHEN
GOSS, an individual,

Defendants

and

ABAKAN, INC., a Nevada corporation,

Nominal Defendant.

Case No. : 2:15-cv-02286-JAD-CWH

**DECLARATION OF CHRISTINA C.
TIZZANO IN SUPPORT OF
DEFENDANT ANDREW J. SHERMAN'S
AMENDED OMNIBUS REPLY IN
SUPPORT OF MOTION TO TRANSFER
VENUE (ECF NO. 127)**

I, Christina C. Tizzano, hereby declare under penalty of perjury as follows:

1. I am an attorney of Chilcote Law Firm LLP and counsel of record for defendant

Andrew Sherman ("Mr. Sherman") in the above-entitled action. I make this declaration in support

1 of Defendant Andrew J. Sherman's Amended Omnibus Reply in Support of Motion to Transfer
2 Venue.

3 2. I submit this Declaration pursuant to L.R. 7-4 and in support of Mr. Sherman
4 Reply Brief in Support of Motion to Transfer Venue.

5 3. Exhibit 1 is a true and correct copy of MesoCoat, Inc. and Powdermet, Inc. Board
6 Meeting Minutes dated April 9, 2013.

7 4. Exhibit 2 is a true and correct copy of Abakan, Inc. Board Meeting Minutes dated
8 April 10, 2013.

9 5. Exhibit 3 is a true and correct copy of MesoCoat, Inc. and Powdermet, Inc. Board
10 Meeting Minutes dated August 26, 2013.

11 6. Exhibit 4 is a true and correct copy of Abakan, Inc. Board Meeting Minutes dated
12 August 27, 2013.

13 7. Exhibit 5 is a true and correct copy of MesoCoat, Inc. Board Meeting Minutes
14 dated August 7, 2014, 2013.

15 8. Exhibit 6 is a true and correct copy of an email chain originating from Defendant
16 Robert Miller's email address robert.miller@abakaninc.com on November 27, 2013 and ending
17 November 29, 2013.

18 9. Exhibit 7 is a true and correct copy of an email dated February 14, 2014
19 originating from Defendant Robert Miller's email address robert.miller@abakaninc.com.

20 10. Exhibit 8 is a true and correct copy of an email dated June 13, 2014 originating
21 from Defendant Stephen Goss' email address scgoss@abakaninc.com.

22 11. Exhibit 9 is a true and correct copy of an email dated February 5, 2015 originating
23 from Defendant Robert Miller's email address robert.miller@abakaninc.com.

24 12. Exhibit 10 is a true and correct copy of Defendant Stephen Goss' verified
25 discovery responses in Cuyahoga County Common Pleas Case No. CV 15 853387 styled *George*
26 *Town Associates S.A. v. Goss*.

27 13. Exhibit 11 is a true and correct copy of Defendant Costas Takkas' Declaration in
28 Opposition to Motion to Transfer Venue.

CHRISTINA C. TIZZANO

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of December, 2016, a true and correct copy of the foregoing **DECLARATION OF CHRISTINA C. TIZZANO IN SUPPORT OF DEFENDANT ANDREW J. SHERMAN'S AMENDED OMNIBUS REPLY IN SUPPORT OF MOTION TO TRANSFER VENUE (ECF NO. 127)** was served on counsel through the Court's electronic service system as follows:

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